

South East Dairy Farmers Association

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July 6, 2005

Docket No. 05-015-1

Regulatory Analysis and Development

PPD, APHIS, Station 3C71

4700 River road, Unit 118

Riverdale, MD 20737

Dear Sir or Madam:

The following comments are submitted on behalf of the Member organizations of South East Dairy Farmers Association. They include: Alabama Farmers Federation, Montgomery, AL; Arkansas Dairy Cooperative Association, Damascus, AR; Cooperative Milk Producers Association, Blackstone, VA; Dairymen's Marketing Cooperative, Inc., Mountain Grove, MO; Georgia Milk Producers, Inc., Watkinsville, GA; Lone Star Milk Producers, Inc., Windthorst, TX; Louisiana Farm Bureau Federation, Baton Rouge, LA; Maryland and Virginia Milk Producers Cooperative Association, Inc., Reston, VA; Missouri Dairy Association, Chesterfield, MO; North Carolina Dairy Producers Association, Raleigh, NC; Piedmont Milk Sales, Inc., Blountville, TN; Virginia State Dairymen's Association, Harrisonburg, VA; Virginia Farm Bureau Federation, Richmond, VA; West Virginia Department of Agriculture, Charleston, WV.

First, Mr. Secretary, thank you for your efforts to expedite the development of a national mandatory animal identification system. It is our opinion that such a system will be an important tool in maintaining public confidence in the safety of the U.S. food supply. It also seems likely that our customers may soon demand such a system. If anything, the Department's five-year time frame for implementation of the National Animal Identification System (NAIS) is too long.

This issue is not new and it is time to move forward with development of NAIS. Dairy producers now routinely affix visible identification to the female animals in their herds. It is our opinion that there will likely be minimal hardship and nominal additional cost to comply with a national system. The most significant additional cost is for identification to be required on dairy-breed male calves but that is not seen as a barrier to implementation of such a valuable tool for maintaining and strengthening our markets.

The *Federal Register* notice asking for public comment on this issue asks for responses to several questions. Our responses appear on the following pages:

Question: *Is a mandatory identification program necessary to achieve a successful animal disease surveillance, monitoring and response system to support Federal animal health programs?*

Yes. It is our belief that everyone must participate for the system to be most effective. A voluntary program just will not get the job done. Activation of a search of information collected by such a system, however, should be limited to circumstances where a professional included on a limited list of public health officials deems that either animal health or human health could be affected by a particular incident.

Question: *In the current Draft Strategic Plan, the NAIS would require that producers be responsible for having their animals identified before the animals move to a premises where they are to be commingled with other animals, such as a sale barn. At what point and how should compliance be ensured? For example, should market managers, fair managers, etc. be responsible for ensuring compliance with this requirement before animals are unloaded at their facility or event?*

One compliance mechanism should be at the point where animals may be commingled. Using the example given of a sale barn or livestock market, records must be kept for payment to be made following the sale of an animal. In the case of fair managers, health documents are required and exhibition records are kept. Adding this responsibility to what is already done will require minimal changes for these entities. Still, direct “premises to premises” sales occur regularly and producers should be encouraged to identify animals at birth in order to maintain the integrity of the system.

Question: *In regard to cattle, individual identification would be achieved with an AIN tag that would be attached to the animal's left ear. It is acknowledged that some producers do not have the facilities to tag their animals; thus the Draft Program Standards document contains an option for tagging sites, which are authorized premises where owners or persons responsible for cattle could have the cattle sent to have AIN tags applied. Do you think this is a viable option; i.e., can markets or other locations successfully provide this service to producers who are unable to tag their cattle at their farms?*

Providing this service at a centralized location would be a valuable service and should be considered as an option to improve compliance. The routine considerations to prevention of disease transmission must be retained and consideration given to producers wishing to maintain “closed-herd” status.

Question: The current Draft Strategic Plan does not specify how compliance with identification and movement reporting requirements will be achieved when the sale is direct between a buyer and seller (or through their agents). In what manner should compliance with these requirements be achieved? Who should be responsible for meeting these requirements? How can these types of transactions be inputted into the NAIS to obtain the necessary information in the least costly, most efficient manner?

Implementation will be most successful if expectations are consistent. In this case, designate buyers as responsible for collecting and reporting the information deemed necessary upon finalization of the NAIS plan.

Question: USDA suggests that animals should be identified anytime prior to entering commerce or being commingled with animals from other premises. Is this recommendation adequate to achieve timely traceback capabilities to support animal health programs or should a timeframe (age limit) for identifying the animals be considered? Please give the reasons for your response.

There should not be a requirement for identification of an animal prior to any opportunity for it to enter commerce or to be commingled with other animals. Effectiveness of traceback will not be hindered by any lack of identification of an animal prior to its leaving the premises of origin.

Question: Are the timelines for implementing the NAIS, as discussed in the Draft Strategic Plan, realistic, too aggressive (i.e., allow too little time) or not aggressive enough (i.e., do not ensure that the NAIS will be implemented in a timely manner)?

The timelines given for implementing the NAIS are not aggressive enough. Dairy producers are already identifying virtually all females as soon after birth as possible. Extension of that to male calves would involve additional expense, some of which would not likely be reimbursed by the market, but would not be a difficult transition for dairy producers. The producers in South East Dairy Farmers Association Member organizations believe that the ability to track animal movements is a valuable tool for maintaining public confidence in the safety of the food supply. The quicker that tool is available in the event it is needed, the better.

Question: Should requirements for all species be implemented within the same timelines, or should some flexibility be allowed?

Industries that are able to implement mandatory animal identification faster than the timelines called for in the USDA strategic plan should have the flexibility to do so. Timelines should not be lengthened from those in the USDA strategic plan.

Question: What are the most cost-effective and efficient ways for submitting information to the database (entered via the Internet, file transfer from a herd management computer system, mail, phone, third-party submission of data)? Does the type of entity (e.g. producer, market, and slaughterhouse), the size of the entity, or other factors make some methods for information submission more or less practical, costly, or efficient?

Flexibility is key here. The more options offered to premises owners the more effective and efficient the system will be. The Department has vast experience dealing with record-keeping systems used by all phases of the food delivery channel in this country. The timelines spelled out in the strategic plan allow for “trial and error” to help determine what combination of data entry, transmission and database management will make NAIS work in the most effective and efficient manner.

Question: We are aware that many producers are concerned about the confidentiality of the information collected in the NAIS. Given the information identified in the draft documents, what specific information do you believe should be protected from disclosure and why?

All information not necessary for tracking the movements of an animal in question regarding a food safety or animal health concern within the timeframe in the NAIS plan upon final implementation should be protected from disclosure. The goal of a 48-hour traceback to premises of origin for animals in question in the event of an incident that may affect human or animal health should be retained.

Question: The NAIS as planned would require States, producers, and other participating entities to provide information and develop and maintain records. How could we best minimize the burden associated with these requirements? For example, should both the seller and the buyer of a specific group of animals report the movement of the animals, or is reporting by one party adequate?

Expectations must be consistent but flexibility can be allowed. The buyer should have the responsibility of reporting animal movements under NAIS but sellers should not be precluded from providing that information.

South East Dairy Farmers Association
Docket 05-015-1
July 6, 2005
Page Five

A key issue in the development of the NAIS concerns the management of animal tracking information. Animal health officials must have immediate, reliable, and uninterrupted access to essential NAIS information for routine surveillance activities and in the event of a disease outbreak. APHIS determined that this goal could best be achieved by having the data repositories managed by APHIS. The Draft Program Standards document provides for two main NAIS information repositories: The National Premises Information Repository and the National Animal Records repository. The National Premises Information repository would maintain data on each production and animal holding location (contact name, address, phone number, type of operation, etc.) The National Animal Records repository would maintain animal identification and movement data.

Recently, however, an industry-led initiative suggested a privately managed database as an alternative for the management of data on animal tracking in the NAIS. The industry group stated that a private database would ensure that the needs of both government and industry would be fulfilled, and that the flow of information throughout the NAIS would be maintained in a secure and confidential manner. APHIS is requesting comment from stakeholders regarding the utility of a privately managed database for holding animal location and movement information.

A government/industry partnership may be able to effectively implement some aspects of the NAIS plan. Management and funding, however, are secondary considerations. The first consideration must be given to the effectiveness of the system in helping to maintain consumer confidence in the safety of the food supply should an incident occur. It is hard to envision any privately run system, either at the state or national level, with ties to industry having the confidence of the public that an independent government-run system would have in the event of a crisis.

Thank you for this opportunity to provide comments on the National Animal Identification System. We look forward to working with USDA to implement a system that works well for consumers, industry and government.

Sincerely,

Charles Garrison
Executive Director